

1 ROB BONTA  
Attorney General of California  
2 BRIAN D. WESLEY (STATE BAR NO. 219018)  
Supervising Deputy Attorney General  
3 TJ FOX (STATE BAR NO. 322938)  
Deputy Attorney General  
4 600 West Broadway, Suite 1800  
San Diego, CA 92101  
Telephone: (619) 738-9000  
5 Facsimile: (619) 645-2581  
E-Mail: TJ.Fox@doj.ca.gov  
6 *Attorneys for Defendants California*  
*Franchise Tax Board and California*  
7 *Department of Tax and Fee Administration*

Bruce A Boice, Esq., SBN: 249296  
Law Office of Boice & Associates  
307 E. Chapman Ave., Suite 102  
Orange, CA  
TEL: 949-690-8647  
FAX: 949-612-0859  
bboice@lawyer.com  
*Attorney for Plaintiff*  
*Joe Torres*

8 IN THE UNITED STATES BANKRUPTCY COURT  
9  
10 CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION

11 In re  
12 JOE TORRES,  
13  
14 Debtor.

Case No.: 2:21-bk-12801-ER  
Chapter 7  
Adversary No.: 2:21-ap-01113-ER

15  
16 **STIPULATION TO EXTEND TIME  
TO RESPOND TO COMPLAINT**

17 JOE TORRES,  
18  
19 Plaintiff,  
20 UNITED STATES OF AMERICA, BY  
21 ITS AGENCY INTERNAL REVENUE  
22 SERVICE; STATE OF CALIFORNIA  
23 FRANCHISE TAX BOARD; and  
24 CALIFORNIA DEPARTMENT OF  
TAX AND FEE ADMINISTRATION,  
25  
26 Defendant(s).

Status Conference  
Date: September 21, 2021  
Time: 10:00 AM  
Judge: Hon. Ernest M. Robles  
Location: 255 E Temple St., Courtroom  
1568, Los Angeles, CA 90012

Pursuant to L.B.R. 9071 and Court Manual Section 4, Plaintiff Joe Torres (“Plaintiff”) and Defendants California Franchise Tax Board and California Department of Tax and Fee Administration (collectively, the “California Defendants”) hereby stipulate and recite as follows:

WHEREAS, on June 21, 2021, Plaintiff filed a Complaint (Adversary Dkt. No. 1) to determine dischargeability of tax liability;

WHEREAS, on June 26, 2021, Plaintiff filed an Amended Complaint (Adversary Dkt. No. 3) to determine dischargeability of tax liability;

WHEREAS, the California Defendants’ current deadline to file a responsive pleading to the Amended Complaint is August 2, 2021;

WHEREAS, due to competing deadlines in other matters, the California Defendants requested and Plaintiff agreed to allow the California Defendants a thirty-day extension of time to respond to the Amended Complaint;

WHEREAS, a thirty-day extension would impose a deadline of September 1, 2021 for the California Defendants to respond to the Amended Complaint;

WHEREAS, the Court set a status conference for September 21, 2021;

WHEREAS, the thirty-day extension of time will not impede the parties’ ability to attend the status conference or file a joint status report.

THE PARTIES HEREBY STIPULATE and jointly request that the California Defendants shall have up to and including September 1, 2021 to submit an answer or otherwise respond to Plaintiff’s Amended Complaint. A proposed order is attached.

1 Dated: July 29, 2021

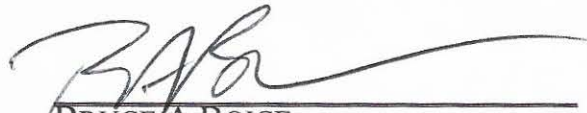
Respectfully submitted,

2 ROB BONTA  
3 Attorney General of California  
4 BRIAN D. WESLEY  
5 Supervising Deputy Attorney General

6 /s/ TJ Fox  
7 TJ FOX  
8 Deputy Attorney General  
9 *Attorneys for Defendants California*  
10 *Franchise Tax Board and California*  
11 *Department of Tax and Fee*  
12 *Administration*

13 Dated: July 29, 2021

14 BRUCE A BOICE  
15 Law Office of Boice & Associates

16   
17 BRUCE A BOICE  
18 Law Office of Boice & Associates  
19 *Attorney for Plaintiff*  
20 *Eric Conrad*

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

**600 West Broadway, Suite 1800, San Diego, CA 92101**

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION TO EXTEND TIME TO \_\_\_\_\_**  
**RESPOND TO COMPLAINT \_\_\_\_\_**

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **July 29, 2021**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

**Attorney for Plaintiff: Bruce A Boice (bboice@lawyer.com)**

**Attorney for Defendant IRS: Gavin L Greene (gavin.greene@usdoj.gov)**

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) **July 29, 2021**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**Trustee: Edward M Wolkowitz (TR), Levene Neale Bender Yoo & Brill LLP, 800 South Figueroa Street, Suite 1260, Los Angeles, CA 90017**

**U.S. Trustee: United States Trustee (LA), 915 Wilshire Blvd., Suite 1850, Los Angeles, CA 90017**

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 29, 2021  
*Date*

TJ Fox  
*Printed Name*

/s/ TJ Fox  
*Signature*

---

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.